

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DONNA M. GRITTERS,	)	
	)	
Plaintiff,	)	
v.	)	No. 14-cv-00916
	)	
OCWEN LOAN SERVICING, LLC;	)	The Honorable Jorge L. Alonso
NATIONSTAR MORTGAGE, LLC;	)	
FEDERAL HOME LOAN MORTGAGE	)	Magistrate Judge Michael T. Mason
CORPORATION; and PIERCE &	)	
ASSOCIATES, P.C.,	)	
	)	
Defendants.	)	

**DEFENDANTS' JOINT MOTION FOR FINAL EXTENSION OF TIME AND  
FOR LEAVE TO FILE BRIEF IN EXCESS OF 15 PAGES**

Defendants Nationstar Mortgage, LLC (“Nationstar”), Ocwen Loan Servicing, LLC (“Ocwen”), and Pierce & Associates, P.C. (“Pierce”) hereby move under Federal Rule of Civil Procedure 6 for a 7-day extension to the deadlines in the briefing schedule on the parties’ forthcoming motions for summary judgment, and also seek leave under Northern District of Illinois Local Rule 7.1 to file a brief in excess of 15 pages. In support of this motion, Defendants state as follows:

1. On August 2, 2016, a status hearing was held before Magistrate Michael T. Mason regarding the status of discovery and because there were no remaining discovery matters, an order was entered referring the case back to this Court. [Dkt. No. 172].
2. At the status hearing on August 30, 2016, the parties indicated they planned to move for summary judgment and the Court entered a briefing schedule giving Defendants until September 20, 2016 to file their motions. [Dkt. No. 175].

3. Defendants have subsequently moved for, and the Court has granted, two extensions to that briefing schedule and Defendants are due to file their motions for summary judgment by October 18, 2016. [Dkt. Nos. 176, 178, 179, 181].

4. Ocwen seeks a final, one-week extension to its filing deadline. Ocwen's undersigned counsel has been diligently preparing a motion for summary judgment but does not anticipate being able to finalize its moving papers—including a 25-page supporting brief—by October 18 despite its best efforts to timely complete the moving papers. Accordingly, Ocwen respectfully requests an additional 7 days, until October 25, 2016, to complete its motion.

5. Defendants' counsel believe it makes sense for the sake of judicial resources for each Defendant to file its motion for summary judgment on the same date, and Nationstar and Pierce therefore seek identical extensions of time.

6. Accordingly, Defendants have good cause and seek a 7-day extension of time to file their motions for summary judgment until October 25, 2016 as well as a similar 7-day extension for the remaining deadlines in the current briefing schedule.

7. This is Defendants' third motion seeking an extension of time regarding their motions for summary judgment and it is not intended to cause unnecessary delay. None of the parties will be prejudiced by an order granting the requested extensions of time.

8. Additionally, for Ocwen to sufficiently address each of the five causes of action asserted against it (breach of contract (Count I), violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (Count II), the Illinois Consumer Fraud and Deceptive Business Practices Act, 815 ILCS 505/1, *et seq.* (Count IV), and the Real Estate Settlement Procedures Act, 12 U.S.C. § 2605, *et seq.* (Count V); and breach of fiduciary duty (Count VI)), Ocwen finds

it necessary to prepare a brief in support of its motion for summary judgment in excess of 15 pages but not longer than 25 pages in length. Nationstar and Pierce join in this request as well.

9. Defendants recognize that this Court grants extensions of the 15-page limit in unusual circumstances, and submit that the number and complexity of the issues that must be addressed justify an exception for the forthcoming briefs in support of the parties' motions for summary judgment.

WHEREFORE, Defendants Ocwen Loan Servicing, LLC, Nationstar Mortgage, LLC, and Pierce & Associates, P.C. respectfully request entry of an Order extending by 7 days the deadlines in the briefing schedule on the parties' motions for summary judgment, granting leave to file supporting briefs which will not exceed 25 pages, and granting such further relief as the Court deems just and proper.

DATED: October 17, 2016

Respectfully submitted,

**Nationstar Mortgage LLC**

By: /s/ Molly E. Thompson

Harry N. Arger  
Molly E. Thompson  
DYKEMA  
10 S. Wacker Dr., Suite 2300  
Chicago, IL 60606

**Ocwen Loan Servicing, LLC**

By: /s/ Chethan Shetty

Chethan Shetty (6300848)  
Simon Fleischmann (6274929)  
Locke Lord LLP  
111 S. Wacker Dr.  
Chicago, IL 60606  
312-443-1887

**Pierce & Associates, P.C.**

By: /s/ Jason Santos

Justin M. Penn  
Jason Santos  
Hinshaw & Culbertson LLP  
222 N. LaSalle, Suite 300  
Chicago, IL 60601  
312-704-3000  
*Attorneys for Pierce*

**CERTIFICATE OF SERVICE**

I, Chethan Shetty, an attorney, certify that I caused the foregoing to be served upon all persons and entities authorized and registered to receive such service through the Court's Case Management/Electronic Case Files (CM/ECF) system on October 17, 2016.

/s/ Chethan Shetty